

U.S. Department of Justice



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 2, 2021

BY ECF

The Honorable James L. Cott
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Chaim Deutsch*,
No. 21 Cr. 264 (JLC)

Dear Judge Cott:

As requested by the Court at sentencing, the Government respectfully submits this letter to memorialize the proposed edits to the final presentence investigation report that were orally noted at sentencing:

Paragraph 21: the criminal tax loss the defendant was held accountable should be amended to \$82,906.

Paragraph 23: the restitution owed to the IRS should be amended to the amount of \$82,906, plus interest through the date of sentencing, totaling \$107,007.05.

Paragraph 28: the tax loss for purposes of the U.S. Sentencing Guidelines should be amended to be \$82,906.

Paragraph 70: the discussion of the defendant's employment with Chasa Management, Inc., should be amended to reflect that, according to its corporate tax returns, Chasa Management was incorporated in 2004, and the defendant began to receive income through the corporation since at least 2008.¹

Paragraph 71: the discussion of the defendant's employment for City Councilman Michael Nelson should be amended to indicate that by 2012, which was his last year of full-time employment, he earned \$45,214.84 from that position according to his W-2. In addition, he

¹ The documents referenced in this letter were previously provided by the Government to defense counsel, and the Government will provide a copy to the Court and the Probation Office upon request.

resigned from that position in 2013, not 2012, as he continued to receive income from that position according to his W-2 for that year.

A new paragraph should be inserted after ¶ 82, which should provide financial information on the defendant's New York City Employee Retirement Account. In particular, according to information from the city, the defendant has a total balance of \$34,778.80 in that account, and is estimated to receive a pension benefit of \$65,162.28 per year beginning on April 15, 2026.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s Eli J. Mark
Eli J. Mark
Assistant United States Attorney
(212) 637-2431

cc: (by ECF)

Henry Mazurek, Esq.
Evan Lipton, Esq.

(by email)

Michelle Millan
United States Probation Officer